



U.S. Department of Agriculture
Office of Inspector General
Great Plains Region
Evaluation Report

Food and Nutrition Service
Strategic Monitoring of the Dakota EBT
System Development Phase IV
Mountain Plains Regional Office
Denver, Colorado



Report No.
27801-6-KC
August 2000



UNITED STATES DEPARTMENT OF AGRICULTURE

OFFICE OF INSPECTOR GENERAL

Great Plains Region

P.O. Box 293

Kansas City, Missouri 64141



DATE: August 17, 2000

REPLY TO

ATTN OF: 27801-6-KC

SUBJECT: Strategic Monitoring of the Dakota EBT System Development Phase IV

TO: William E. Ludwig
Regional Administrator
Food and Nutrition Service, USDA
1244 Speer Boulevard, Suite 903
Denver, CO 80204

This report presents the results of our evaluation of the development of the Dakota EBT system. The review disclosed that the system had been successfully implemented but that some system and procedural enhancements were needed. We also noted that State agency procedures related to monitoring group living arrangements could be improved.

Your August 9, 2000, written response is included as exhibit A of the report. We understand that upon receipt of this report, your staff will present the findings and recommendations to the State agency for their response. In order to reach management decisions on the recommendations, we need to be informed as to the final corrective action taken by the State agency. Please furnish a reply within 60 days describing the corrective actions taken or planned for each of the recommendations, including timeframes for implementation.

Note that Departmental Regulation 1720-1 requires a management decision be reached for all findings and recommendations within a maximum of 6 months after report issuance. We appreciated the cooperation and assistance extended by the Regional office staff during the review.

/s/

EDWIN D. LINDERMAN
Regional Inspector General
for Audit

Attachment

EXECUTIVE SUMMARY

FOOD AND NUTRITION SERVICE STRATEGIC MONITORING OF THE DAKOTA EBT SYSTEM DEVELOPMENT MOUNTAIN PLAINS REGIONAL OFFICE DENVER, COLORADO

EVALUATION No. 27801-6-KC

RESULTS IN BRIEF

Electronic benefit transfer (EBT) represents a new system for disbursing Food Stamp Program (FSP) benefits. We initiated this review to provide an evaluation of the adequacy

of established controls over EBT operations for the FSP in North Dakota and South Dakota and an assessment on whether controls functioned as designed. The evaluation disclosed the Dakota EBT system was successfully implemented. The Dakota EBT system¹, including contractor operations, had sufficient procedures to ensure proper training and issuance of benefit cards, security over unissued benefit cards, and proper controls over and usage of EBT management reports.

The North Dakota Department of Human Services and the South Dakota Department of Social Services needed to improve controls in some areas to strengthen EBT administration and reduce the risk to FSP funds from waste, loss, unauthorized use, and misappropriation. We also found that, although the EBT system was properly paying benefits to residents at group living arrangements, controls needed to be strengthened to ensure that these facilities are adhering to program requirements. Also, the two State agencies (SA) were not performing monitoring visits of these group facilities.

The North Dakota SA also needed to strengthen controls over access to the EBT system. The North Dakota SA had not cancelled user logon identifiers (ID's) in the EBT system for persons no longer employed by the county. Also, both North Dakota and South Dakota SA's had not maintained a listing of the last date each authorized user accessed the EBT system to ensure persons no longer working with the system were removed as authorized users.

KEY RECOMMENDATIONS

We recommended the Mountain Plains Regional Office (MPRO) (1) require the North Dakota SA personnel to establish and implement written procedures for monitoring

logon ID's, and require both the North Dakota and South Dakota SA's to review user access permission on a periodic basis and cancel logon ID's as appropriate to the extent possible under current EBT contract provisions and cost limits, and

¹ North Dakota and South Dakota have a joint EBT contract and converged together as the Dakota EBT system.

(2) require both SA's to improve controls at group living arrangements by conducting required monitoring visits of these facilities.

FNS RESPONSE

The written response to the evaluation dated August 9, 2000, showed that FNS was in general agreement with the findings and recommendations. The response showed disagreement with our recommended corrective action related to accounting for food purchases by group living arrangements and disagreement with some of the wording in two of the recommendations as originally presented in our draft report.

OIG POSITION

We generally concurred with the FNS concerns and changed the report accordingly. We have also included additional clarification of our recommendations related to accounting for food purchases and reports to show refund of clients' benefits by group living arrangements.

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INTRODUCTION

BACKGROUND

The Food and Nutrition Service (FNS), an agency of the U.S. Department of Agriculture, administers the Food Stamp Program (FSP).

The FSP assists low-income households by increasing their ability to purchase food. FNS administers the FSP through a Federal-State partnership. The Federal Government pays the full cost of recipient benefits and shares the cost to administer the FSP with the States. Congress funds the FSP through direct appropriation.

In the past, the basic method of FSP benefit delivery was the food stamp coupon. Once a month, each participating household received an allotment of coupons determined by the number of individuals in the family, household income, and other related factors. Recipients could use the coupons to pay for food items at participating food retailers. As an innovation of the mid-1980's, electronic benefit transfer (EBT) was developed to replace paper coupons with an electronic system. EBT systems are a computerized version of the food benefits delivery process. Using plastic cards, much like debit cards, recipients gain access to benefits through point-of-sale (POS) terminals located at approved food retailers.

FNS pioneered EBT system development with a demonstration project in Reading, PA, beginning in 1984. FNS compared the Reading EBT system for food stamps to coupon-based issuance in terms of administrative cost, vulnerability to benefit loss and abuse, and the impact on participating food retailers. The evaluation showed that EBT had a positive effect on each measured area except administrative cost. Widespread interest in EBT was expressed, despite the high cost of operating the first system. The Personal Responsibility and Work Opportunity Reconciliation Act, P.L. 104-193, required that States implement EBT systems before October 1, 2002. As of October 1999, 38 States and the District of Columbia had operational on-line food stamp EBT systems.

North Dakota and South Dakota have a joint EBT contract and converged together as the Dakota EBT system. For Fiscal Year (FY) 1999, all of the \$63 million Dakota FSP benefits were paid through EBT. A nationwide EBT system will deliver over \$111 billion in benefits annually by 1999 according to the Federal EBT Council. The Dakota EBT system was implemented in February 1996 as part of a pilot project, and became fully operational statewide in March 1997.

FNS established approval rules for the delivery of food stamps using EBT systems in Title 7 Code of Federal Regulations (CFR), §274.12 and for approving automated data processing (ADP) systems in 7 CFR, §277.18.

The regulations specify functional areas to be addressed by the State agencies (SA) but do not establish a standardized system of internal controls. FNS' policy is to allow the States the flexibility to establish control systems that meet each State's individual needs. Generally, States award contracts to private sector companies to develop and operate their EBT systems. However, the States remain financially liable to the Federal Government for the actions of their EBT processors. These companies are usually organizations that already handle electronic funds transfer activities.

States may implement either open or closed EBT systems. Open systems use joint agreements between groups of States and/or the Federal Government to exchange data between members. Several alliances of States have been formed or are negotiating contracts to implement open systems, including the Southern Alliance of States, the Northeast Coalition of States, and the Western States EBT Alliance. Open systems generally permit redemption of benefits at retailers in all States in the alliance. Closed systems do not provide service beyond the State's borders. Currently, North Dakota and South Dakota have a joint agreement called the Dakota EBT system permitting redemption of benefits at retailers between the two States.

FSP participants in North Dakota and South Dakota are provided a plastic benefit card. The card has a magnetic stripe containing basic identifying information to make food purchases. At the retailer, the recipient presents the card and enters a unique personal identification number (PIN) into a POS terminal. The POS terminal communicates with a central database which maintains recipient account balance information. The central database verifies the amount of benefits available, authorizes the transaction, and debits the household account for the amount of the purchase. The EBT system calculates the cumulative FSP sales for each retailer and authorizes payment by electronic transfer of funds to retailer bank accounts.

FNS established the Account Management Agent (AMA) to improve its monitoring and management of FSP funds paid via EBT. FNS' management of FSP funds involves several automated systems including FNS' accounting system, the Agency Financial Management System (AFMS); the AMA system; and the Automated Standard Application for Payments (ASAP) system. Payment of FSP retailers occurs through ASAP. ASAP is a centralized system for the request and delivery of Federal funds developed by the U.S. Department of the Treasury and the Federal Reserve Bank.

Each day, EBT processors transmit the total amount of benefit authorizations to AMA where the benefits are accumulated. The AMA provides the approved State benefit authorization information to the ASAP. The EBT processor can draw Federal funds up to the cumulative amount of approved benefit authorizations in the ASAP system. AMA transfers the total amount of benefit authorizations from all States to AFMS. AFMS posts the authorization data as FSP obligations. EBT processors enter their payment

requests into ASAP. ASAP verifies that a sufficient unliquidated obligation balance exists, the difference between cumulative State benefit authorizations and previous payments, and then pays the EBT processor. Each day AMA extracts the payment information from ASAP and updates each State account. AMA transfers the total payment for all States to AFMS. AFMS posts the payment data as liquidations of FSP obligations.

Periodically, the EBT processor transfers FSP redemption data to FNS' Store Tracking, Authorization and Redemption Subsystem (STARS). STARS supports the entry and maintenance pertaining to the 186,000 retailers authorized by FNS to redeem food coupons and EBT transactions.

Citibank is the prime contractor for the Dakota EBT system and performs all of the EBT processing including posting the benefit authorizations to the client's accounts. Citibank performs all of the settlement transactions which include payments to retailers. Citibank delivers and installs POS terminals at participating stores. The local food stamp office determines if the recipient is eligible for food stamp benefits and enters necessary recipient data into the State system.

OBJECTIVES

The primary objective of the review was to provide an evaluation of the adequacy of the Dakota EBT internal controls and an assessment on whether controls functioned as designed. Specifically, we (1) identified internal controls established in key operational areas, (2) included tests to ensure controls were in place and operated as designed, and (3) provided an assessment of the adequacy of prescribed controls.

SCOPE

The evaluation was conducted at the FNS Mountain Plains Regional Office (MPRO) in Denver, Colorado, the North Dakota Department of Human Services in Bismarck, North Dakota and the South Dakota Department of Social Services in Pierre, South Dakota. We evaluated the MPRO oversight of the EBT system and the two State agencies' (SA) administration and management of the EBT system for the FSP. We conducted our fieldwork from December 1999 through February 2000. Our review dealt with transactions that occurred primarily in FY 1999. The evaluation did not include reviews at retailers or local food stamp county offices.

The evaluation was performed in accordance with the Quality Standards for Inspections issued by the President's Council on Integrity and Efficiency.

METHODOLOGY

To accomplish the objectives of the evaluation, we relied on documentary, analytical, and testimonial evidence. We visited and interviewed personnel at the MPRO in Denver,

Colorado, and the SA in Bismarck, North Dakota and Pierre, South Dakota. Our analysis dealt with transactions that occurred primarily in FY 1999. We evaluated internal controls over SA reconciliation of FSP authorization data and claims collections, help desk operations, fraud detection, benefit availability, the EBT processor's internal control structure, EBT management reports, returned EBT benefit cards, aged FSP benefits, conversion of EBT authorizations to coupons, use of and access to EBT benefits in group living arrangements, and access to and security over the EBT system. We compared the Dakota EBT operation with the requirements of the Food Stamp Act of 1977, as amended, and with 7 CFR, sections 246, 272, 273, 274, 276, and 277.

FINDINGS AND RECOMMENDATIONS

CHAPTER 1	INTERNAL CONTROLS OVER EBT NEED STRENGTHENING
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We found that overall the controls over the Dakota EBT system were functioning as prescribed. The North Dakota Department of Human Services and the South Dakota Department of Social Services were performing adequate reconciliation reviews, and the MPRO's oversight activities were adequate. However, we noted that controls could be improved. Both SA's need to improve controls over access to the EBT system by identifying and removing users who no longer need access.

FINDING NO. 1
OBSOLETE LOGON ID'S NOT CANCELLED

The North Dakota SA had not cancelled logon identifiers (ID) for 2 individuals in the EBT system who were no longer employed by the local county office. This occurred because controls used by the SA did not always detect terminated employees with active logon ID's.

Also, both North Dakota and South Dakota SA's had not maintained a listing of the last date each authorized user accessed the system.² This occurred because neither SA requested such listing from the EBT processor. As a result, both SA's were unable to properly evaluate who had access to the EBT system and if the access was needed.

We obtained a listing of authorized EBT system users from the North Dakota and South Dakota SA's. We also obtained a listing of individuals that had terminated employment with the two SA's, in the last 6 months, from each SA's Personnel Department. We compared the listings and found two individuals, in North Dakota, with active logon ID's who were no longer employed by the local county office.

SA personnel stated that supervisors at the State and local county offices are supposed to notify the Security Officer when an employee is terminated. The

² 7 CFR, part 274, section 274.12(h)(3)(v), dated January 1, 1999, states, "A separate EBT security component shall be incorporated into the State agency Security Program for Automated Data Processing (ADP) systems where appropriate and as prescribed under 277.18(p) of this chapter. The periodic risk analyses required by the Security Program shall address the following items specific to an EBT system: (A) EBT system vulnerability to theft and unauthorized use;...(C) Vulnerability to tampering with or creating household accounts;"

7 CFR, part 277, section 277.18(p)(1), dated January 1, 1999, states, "State and local agencies are responsible for the security of all ADP projects under development, and operational systems involved in the administration of the Food Stamp Program."

Security Officer would then revoke their access, if any, to the EBT system. Our review showed this information was not always provided to the Security Officer in a timely manner. SA personnel also stated that if they are not notified of an employee's termination, a backup system was in place which would revoke the employee's access. For example, if an employee does not access the system within 30 days, the system would automatically revoke their access. However, our February 2000 review at the North Dakota SA showed that these two individuals, with active logon ID's, had been terminated in November 1999 and December 1999. SA personnel informed us that the Security Officer does not receive a monthly listing from the State Personnel Department which shows State and county employees that have been terminated.

In addition, the North Dakota and South Dakota SA's could not monitor the last date each authorized user accessed the EBT system to ensure persons no longer working with the system were removed as authorized users. This occurred because both SA's did not request regularly scheduled reports, from the EBT processor, showing the last system access date for each authorized user. Therefore, no such reports were provided by the EBT processor.

RECOMMENDATION NO. 1

Require North Dakota SA personnel to establish and implement written procedures for monitoring logon ID's, and require both the North Dakota and South Dakota SA's to review user access permission on a periodic basis and cancel logon ID's as appropriate to the extent possible under current EBT contract provisions and cost limits.

FNS Response

The written response, dated August 9, 2000, to the official draft report, showed that FNS concurred with the finding and recommendation.

OIG Position

In order to reach a management decision on this recommendation, we need to be informed as to the corrective action taken by the SA.

CHAPTER 2

ADDITIONAL CONTROLS WERE NEEDED FOR GROUP LIVING ARRANGEMENTS (GLA)

The North Dakota Department of Human Services and the South Dakota Department of Social Services needed to implement additional controls over GLA's to ensure they were adhering to FSP requirements, including the requirements for using EBT benefits only for authorized purposes and providing refunds of benefits to departing clients when appropriate. We found no evidence that the SA's made any monitoring visits to the GLA's. Although the EBT system was functioning properly in providing benefits to residents at GLA's, the lack of controls and monitoring reduced assurance that (1) benefits were only paid to food stamp program participants; (2) benefits were only spent for authorized food purchases; and (3) clients received required benefit refunds when leaving the GLA.

FINDING NO. 2

GROUP LIVING ARRANGEMENTS WERE NOT MONITORED

Required monitoring visits were not conducted at GLA's to ensure that food stamp recipients were residing at GLA's, proper amounts of benefits were returned to recipients when they left the facility, and authorized GLA representatives were using FSP benefits only

for authorized food purchases. The North Dakota Department of Human Services and the South Dakota Department of Social Services personnel said that they believed they were not responsible for conducting reviews of GLA's. As a result, there was limited assurance that food stamp benefits were being used for authorized purposes at GLA's.

Federal regulations require GLA's to provide the SA's with a listing of currently participating FSP residents, and that the listing be required on a periodic basis.³ However, no such listings were provided to either of the SA's. The SA's are also required by Federal regulations to conduct periodic random onsite visits at GLA's to ensure the accuracy of the listing of eligible residents.⁴

In addition, the GLA is required to return half of the household's monthly benefits if the household leaves the facility prior to the 16th of the month.⁵ The

³ 7 CFR, 273.11 (f) (2), dated January 1, 1999, states, "Each group living arrangement shall provide the SA with a list of currently participating residents. The list shall include a statement signed by a responsible center official attesting to the validity of the list."

⁴ 7 CFR, part 273, section 273.11(f)(2), dated January 1, 1999, states, "the State agency shall conduct periodic random onsite visits to assure the accuracy of the list and that the State agency's records are consistent and up to date."

⁵ 7 CFR, part 273, section 273.11(f)(5)(i), dated January 1, 1999, states that, if the household leaves the group living

North Dakota and South Dakota SA's had not been conducting monitoring visits to ensure GLA's were returning required portions of food stamp benefits to departing households. Proper monitoring of the EBT system, visits to the facilities, and keeping track of funds spent by the group homes, could help ensure departing clients are properly refunded, through EBT, for appropriate benefits.

In North Dakota and South Dakota, some GLA's have POS terminals which process food stamp transactions. The recipients swipe their EBT cards through the terminal, enter their personal identification number (PIN), and their food stamp benefits are transferred to the GLA's financial institution as cash. The GLA may write checks or use cash to purchase food for residing food stamp recipients. However, there were no controls in place to ensure that food stamp purchases made by the facilities were for authorized purchases. Also, controls were not in place to account for all money withdrawn from the bank and spent on food items, or to ensure that all money was timely redeposited back into the bank which was not spent on food. We believe that without proper controls in place, food stamp benefits, accessed by the facility as cash, will be vulnerable to theft as well as other misuse.

RECOMMENDATION NO. 2

Direct the North Dakota and South Dakota SA's to implement procedures to require all GLA's to provide the corresponding SA's with listings of eligible FSP residents on a periodic basis.

FNS Response

The written response, dated August 9, 2000, to the official draft report, showed that FNS concurred with the finding and recommendation.

OIG Position

In order to reach a management decision on this recommendation, we need to be informed as to the corrective action taken by the SA.

arrangement prior to the 16th of the month, the facility shall provide the household with its ID card, if applicable, and one half of its monthly coupon allotment.

RECOMMENDATION NO. 3

facility.

Require the North Dakota and South Dakota SA's to make reviews of GLA's records and EBT data to ensure that participants receive the proper amount of benefits when they leave the

FNS Response

The written response, dated August 9, 2000, to the official draft report, showed that FNS concurred with the finding and recommendation.

OIG Position

In order to reach a management decision on this recommendation, we need to be informed as to the corrective action taken by the SA.

RECOMMENDATION NO. 4

Direct the North Dakota and South Dakota SA's to show how food stamp client's benefits will be returned or refunded if they leave the GLA prior to the 16th of the month.

FNS Response

The written response to the official draft report by FNS stated that data already exists within the State's EBT system to show the refund of client's benefits.

OIG Position

In order to reach a management decision on this recommendation, we need to be informed if the SA plans to utilize the existing EBT data on refunds to monitor the refund of client's benefits when they leave GLA's.

RECOMMENDATION NO. 5

Require the North Dakota and South Dakota SA's to implement procedures to ensure onsite visits of group living arrangements are made on a periodic basis.

FNS Response

The written response, dated August 9, 2000, to the official draft report, showed that FNS concurred with the finding and recommendation.

OIG Position

In order to reach a management decision on this recommendation, we need to be informed as to the corrective action taken by the SA.

RECOMMENDATION NO. 6

Direct the North Dakota and South Dakota SA's to establish controls to ensure that purchases made by GLA's which use POS terminals are for authorized purchases by conducting required monitoring visits. Require that SA's visits include a review of bank statements to determine if amounts deposited for food are reasonable, and a review of store receipts and food pantries to determine if food purchases are reasonable.

FNS Response

The written response to the official draft report by FNS stated that the food stamp regulations do not support a requirement that a GLA maintain records and/or bank accounts to document authorized food purchases using EBT food benefits. The reply also stated that compliance with this recommendation might require GLA's to completely revise their bookkeeping and accounting systems, and restructure their banking procedures.

OIG Position

We agree there is no requirement for GLA's to restructure banking procedures or to completely revise their bookkeeping and accounting systems to document authorized food stamp purchases. However, Federal regulations do require that SA's conduct onsite monitoring visits. We believe that during the monitoring visits, the SA should review the GLA's bank statements to determine if the amount of money deposited in the GLA's bank account via POS terminals, for food purchases, is reasonable as compared to the number of food stamp clients residing at the facility. The monitoring visit should also include a review of store receipts and food pantries to reasonably assure that EBT benefits are being spent for authorized food purchases. In order to reach a management decision on this recommendation, we need to be informed as to the SA's plans concerning monitoring visits of GLA's.

EXHIBIT A - FNS REGIONAL OFFICE REPLY TO THE EVALUATION



United States Department of Agriculture
Food and Consumer Service

Mountain Plains Region

AUG 09 2000

Reply to: MPFS 400:FS 9-4-3-1
Attn of:

Subject: FSP - Dakota Project Electronic Benefit Transfer (EBT) Audit No. 27801-6-KC
To:

Edwin D. Linderman
Regional Inspector General for Audit
USDA, Office of Inspector General
P.O. Box 293
Kansas City, Missouri 64141-6205

This is in reference to an August 3, 2000 telephone conversation with members of your staff and your memorandum dated June 22, 2000 transmitting the official draft report of the subject report. We would also like to reference our May 26, 2000 memorandum to you, which provided our response on the final draft report of the Utah EBT Audit No. 27801-5-KC. With the exception of the comments provided below, we agree with all the audit background information, findings and recommendations. Our comments are as follows:

Chapter 2, Finding No. 2: We recommend that Recommendation No. 4 be revised to preclude the State from having to develop another EBT report. As discussed with your staff, there already exists within the State's EBT system enough data and reporting mechanisms to supply the information the audit refers to. We do not agree that the development of yet another report, or even determining the feasibility of such a report, is the correct approach. The issue which we feel the audit should be altered to reflect is that the State should utilize the EBT information already available to monitor Group Living Arrangements (GLAs).

As discussed in the telephone conversation, and in our May 26, 2000 memorandum, we strongly recommend the removal of Recommendation No. 6 from this audit as we did Recommendation No. 8 from the Utah audit. Neither the Food Stamp Act, nor its regulations, support a requirement that a GLA maintain records and/or bank accounts to document authorized food purchases using EBT food benefits. For a GLA to comply with this recommendation, it would be necessary for it, in most cases, to completely revise its bookkeeping and accounting system. It is also possible this requirement would require the GLA to restructure its banking procedures. Either possibility could be extremely costly and time consuming and result from an unsubstantiated requirement.

It is our understanding, based on the telephone discussion, that your National Office has identified this issue as a program weakness. Since that office is apparently discussing a final decision with the Food and Nutrition Service on this particular issue, we do not feel that it is appropriate to impose a requirement on three states that is not supported by the Food Stamp Act or Regulations. There is also a strong likelihood that this recommendation will delay a timely Management Decision on both referenced audits as the states will, as does this office, take exception with this issue. Also, we wish to mention that the GLA monitoring activities identified in the audit are handled by the eligibility determination portion of the State's Food Stamp Program. Therefore, it is very likely that the portion of the State's program responsible for EBT is not involved in, nor aware of, these monitoring responsibilities.

When the final audit report is received, we will provide it to the North and South Dakota State Agencies and request corrective action(s) for the recommendations. If members of your staff have any additional questions, Will Holmes may be contacted at (303) 844-0340.



ALLAN C. NICKELS
Regional Director
Food Stamp Program

ABBREVIATIONS

ADP	
Automated Data Processing	2
AFMS	
Agency Financial Management System	2
AMA	
Account Management Agent.....	2
ASAP	
Automated Standard Application for Payments	2
CFR	
Code of Federal Regulations.....	2
EBT	
Electronic Benefit Transfer.....	1
FNS	
Food and Nutrition Service	1
FSP	
Food Stamp Program.....	1
FY	
Fiscal Year	1
GLA	
Group Living Arrangement.....	7
ID	
Identifier.....	5
MPRO	
Mountain Plains Regional Office	3
OIG	
Office of Inspector General.....	3

PIN	
Personal Identification Number.....	2
POS	
Point-of-Sale	1
SA	
State Agency	3
STARS	
Store Tracking and Redemption Subsystem	3